

Message

From: Gray, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=881C62B1E54142388C1DE2F8E3799C33-GRAY, DAVID]
Sent: 3/20/2019 9:04:56 PM
To: Cohen, Jacqueline [jackie.cohen@mail.house.gov]; ryan.vise@tceq.texas.gov
CC: Chancellor, Erin [chancellor.erin@epa.gov]; Ringel, Aaron [ringel.aaron@epa.gov]; Rodrick, Christian [rodrick.christian@epa.gov]
Subject: RE: Deer Park Fire

Hi Jacqueline,

I was able to get you some additional information about the TCEQ air monitoring. I am also copying Ryan Vise with TCEQ so that you have a direct POC for future questions on their work.

David

Air Monitoring – you mentioned that the QC check on Monday was “required in the days following a repair” – is that a requirement of the repair contract or another instrument? Was the check required to be that day at that time?

It is an operational requirement per TCEQ AutoGC Standard Operating Procedure to perform a multipoint calibration as quickly as possible when the system has stabilized after major maintenance. Monday morning was the first opportunity for the contractor to perform the multipoint calibration curve, although it was not required to be done on Monday. The TCEQ was not aware that the contractor would be performing the multipoint check on Monday, although the contractor is not required to notify the TCEQ beforehand. However, if the contractor had waited to perform the check at a later date and the results had not met acceptance criteria, there would have been an increased risk of needing to invalidate samples that had been collected prior to the multipoint check.

Was a backup monitor deployed before the monitor was taken offline, given the ongoing air release event?

The monitor was never actually taken offline. A backup monitor was not deployed. If a backup monitor had been deployed, the necessary calibration and setup of the backup instrument would have taken longer than the multipoint QC check. Therefore, it still would not have provided data during the 6:00 am to noon timeframe.

Are monitors being deployed southwest of the site?

TCEQ has personnel on-site conducting air assessments throughout the area.

From: Cohen, Jacqueline <jackie.cohen@mail.house.gov>
Sent: Wednesday, March 20, 2019 9:23 AM
To: Gray, David <gray.david@epa.gov>; Rodrick, Christian <rodrick.christian@epa.gov>
Cc: Chancellor, Erin <chancellor.erin@epa.gov>; Ringel, Aaron <ringel.aaron@epa.gov>
Subject: RE: Deer Park Fire

A couple of additional follow up questions.

Air Monitoring – you mentioned that the QC check on Monday was “required in the days following a repair” – is that a requirement of the repair contract or another instrument? Was the check required to be that day at that time? Was a backup monitor deployed before the monitor was taken offline, given the ongoing air release event?

Are monitors being deployed southwest of the site?

Fire foam – both SDS sheets note the presence of fluoroalkyl components in the foams and both note requirements to prevent the foam from entering surface water. What is being done to ensure the foam isn't entering the water at the site?

From: Gray, David <gray.david@epa.gov>

Sent: Tuesday, March 19, 2019 5:09 PM

To: Cohen, Jacqueline <jackie.cohen@mail.house.gov>; Rodrick, Christian <rodrick.christian@epa.gov>

Cc: Chancellor, Erin <chancellor.erin@epa.gov>; Ringel, Aaron <ringel.aaron@epa.gov>

Subject: RE: Deer Park Fire

Jacqueline,

Good talking with you earlier. Here is the follow up information that you requested during the call with Christian and me. You have been added to our daily Congressional Update list regarding this incident.

David

David Gray

Deputy Regional Administrator

EPA Region 6 (Arkansas, Louisiana, New Mexico, Oklahoma and Texas)

General including EPA Air Monitoring

The U.S. Environmental Protection Agency (EPA) and Texas Commission on Environmental Quality (TCEQ) are working with Unified Command in response to a fire at the Intercontinental Terminals Corporation (ITC) Deer Park facility near Houston, TX. The Unified Command consists of EPA, TCEQ, U.S. Coast Guard (USCG), Harris County Pollution Control Services (HPCPS) and ITC. Emergency responders continue to use foam to control and prevent spreading of the fire. EPA has conducted, and continues to conduct, air monitoring with the Airborne Spectral Photometric Environmental Collection Technology aircraft (ASPECT) and has not measured any significant detections in the vicinity and downwind of the incident.

RMP

The RMP Amendments rule became effective September 21, 2018. However, most of the major provisions of the rule have compliance dates in 2021 or 2022. RMP facilities are not required to submit updated risk management plans reflecting changes associated with the Amendments until March 14, 2022. ITC Deer Park is an RMP-regulated facility, which last updated its RMP in March, 2018.

Fire Foam

Emergency responders are using foam to control the fire and prevent the fire from spreading to the remaining tanks within the contained area. We have checked on the type of foam being deployed and attached are the Chemical Data Sheets.

Texas Air Monitor (Information provided by TCEQ)

The TCEQ ambient monitoring station at Houston Deer Park (CAMS 35) experienced operational issues with the AutoGC sampler, indicated by quality control failures on March 11. Therefore, data were invalidated back to the previous passing daily QC check which was March 10. Only the AutoGC was affected; other samplers at this monitoring station continued to operate normally.

The TCEQ contractor performed the repair March 13-16. Following this repair, the contractor must run a 1-point QC check, followed by a multi-point check typically completed within a few days. The instrument passed the 1-point QC

check at 8:00 am on Saturday, March 16. The instrument resumed ambient data collection at 11:00 am on Saturday, March 16, the day before the fire. The instrument continued to collect ambient data throughout the day on Sunday, March 17 and into Monday, March 18 until 5:00 am. The contractor began the multi-point check at 6:00 am on Monday, March 18, this QC check is required in the days following a repair. The multi-point check was completed and ambient data collection has resumed as of 1:00 pm, Monday, March 18. The ambient data collected from Saturday, March 16 through early Monday, March 18 have undergone preliminary review and are within required quality standards. The valid ambient AutoGC data collection resumed at 1:00 pm CST and data appears ambient and consistent with normal trends.

From: Cohen, Jacqueline <jackie.cohen@mail.house.gov>
Sent: Tuesday, March 19, 2019 3:04 PM
To: Rodrick, Christian <rodrick.christian@epa.gov>
Cc: Gray, David <gray.david@epa.gov>; Chancellor, Erin <chancellor.erin@epa.gov>; Ringel, Aaron <ringel.aaron@epa.gov>
Subject: RE: Deer Park Fire

That would be great. I am free for the next hour. My direct is 226-9063.

From: Rodrick, Christian <rodrick.christian@epa.gov>
Sent: Tuesday, March 19, 2019 3:53 PM
To: Cohen, Jacqueline <jackie.cohen@mail.house.gov>
Cc: Gray, David <gray.david@epa.gov>; Chancellor, Erin <chancellor.erin@epa.gov>; Ringel, Aaron <ringel.aaron@epa.gov>
Subject: Deer Park Fire

Jackie,

I understand you reached out to Matt regarding the Deer Park fire. Do you have any time for a call this afternoon with myself and David and Erin from our Regional office to discuss?

Thanks,

Christian Rodrick
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